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March 18, 2025

Judge Andrew L. Carter, Jr. Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

RE: Simon Isakov et al. vs. Dylans Candybar, LLC; Civ. Action No.: 1:25-cv-01201-ALC

Dear Judge Carter:

I represent the defendant Dylans Candybar, LLC ("Defendant"), in the above-referenced action. We write to respectfully request that Your Honor extend the deadline for Defendant to Answer, Move Against, or Otherwise Respond to the Plaintiff's Complaint from March 19, 2025, up to and including April 18, 2025.

On February 11, 2025, Plaintiff filed a Complaint against Defendant in the U.S. District Court for the Southern District of New York. Defendant was served with a copy of the Complaint on February 26, 2025, making the response to the Complaint due on March 19, 2025.

We have conferred with Plaintiff's counsel, and they consent to our request for an extension for Defendant to respond to the Complaint. The extension is needed to analyze and/or investigate the matters set forth in the Complaint, confer with our client, explore settlement, and, if necessary, prepare a response. No previous requests for an extension of time to respond have been made by Defendant. The requested extension does not affect any other scheduled dates.

Thank you for your consideration of this request.

Respectfully Submitted,

By: <u>/s/ Deyuan Lin</u> Deyuan Lin

CC: All Counsel of Record (via ECF)